

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,
REGARDING KPMG'S EXCEPTION NO. 4 (ORIGINAL VERSION)

KPMG Exception No. 4: KPMG observed that a substantial portion of the documentation in the LSOG 4 Pre-Order and Order Business Rules and the EDI Pre-Order and Order Guides is incomplete, incorrect or unclear.

Domain: Pre-Order, Order and Provisioning (POP)

KPMG Assessment: If LSOG documentation is missing, incorrect or unclear in Pre-Order and Order Business Rules and EDI Pre-Order and Order Guide a CLEC cannot receive the correct response (e.g. confirmation or error) from BA and cannot properly format a transaction.

Date of Exception: February 16, 2000

Date of BA Response: February 24 2000

Date of AT&T Comments: March 10, 2000

AT&T Comments:

AT&T agrees with KPMG's findings with respect to errors in Bell Atlantic's EDI documentation. KPMG has identified approximately 100 discrepancies in what should be a relatively well-developed set of rules for the Bell Atlantic-North OSSs. KPMG is experiencing these problems in a simulated environment with no customers at risk and no brand reputation at stake. These problems are even more significant when experienced in the commercial production environment.

KPMG has identified a serious problem that the CLECs experience during virtually every BA release. The documentation produced by Bell Atlantic frequently contains significant errors, omissions and ambiguities that cause confusion, further errors and delays with CLEC software releases. Bell Atlantic's apparent carelessness results in CLECs expending resources to clarify, with Bell Atlantic, all of these discrepancies. The CLEC then is subject to waiting several weeks for any meaningful responses from BA. There are real costs associated with these problems, i.e. the costs associated with waiting for corrections on the documentation and the costs associated with CLEC delays for market entry.

When a CLEC reviews BA's EDI specifications it is important to be able to relate the field specification with an EDI example to understand where and how the data is positioned within the EDI transaction. When BA's documentation is incomplete, incorrect or otherwise riddled with

problems, the CLECs are left to their best judgment as to the positioning of the data elements. Naturally, such an approach would not always yield a correct result. Subsequently, the edits within the BA EDI application will cause the order to be rejected. BA must provide correct and relevant EDI examples so that the CLEC can conduct the necessary edits to correctly present the data over the interface. If BA does this, there would be a minimum of confusion, errors and rejects from BA.

AT&T questions two of BA's responses to this Exception and recommends that KPMG undertake further probes. In its response to Issue 4.2, BA states that an image of the Order would be returned in the MLT field. AT&T concludes that it does not appear possible that a Bell Atlantic service order image will fit within a 81-byte field that only has one occurrence.

In its response to Issue 4.6, BA states that it corrected the discrepancy identified by KPMG in a Bulletin #1273. AT&T's copy of Bulletin #1273 has the same ISA, ISR, LXA and LXR notations as cited by KPMG. Thus, these items could not have been corrected by Bulletin #1273 as BA stated in its response. AT&T recommends that KPMG obtains clarification from BA.